1	George Haines Esq.	
	Nevada Bar No. 9411	
2	Gerardo Avalos, Esq.	
3	Nevada Bar No. 15171	
3	FREEDOM LAW FIRM, LLC	
4	8985 South Eastern Ave., Suite 100	
١.	Law Vegas, NV 89123	
5	Phone: (702) 880-5554	
	FAX: (702) 385-5518	
6	Email: info@freedomlegalteam.com	
7	Attorneys for Plaintiff Tamara Stewart	
7		
8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
9		
	Tamara Stewart,	Case No.: 2:24-cv-02296-JAD-DJA
10		
11	Plaintiff,	
11	v.	PLAINTIFF'S UNOPPOSED MOTION FOR
12		EXTENSION OF TIME FOR TRANS
	Equifax Information Services LLC; Trans	UNION TO ANSWER
13	Union LLC; Experian Information Solution,	
	Inc. and Allied Collection Services, Inc.,	
14		
15	Defendants.	
13		
16		
	Tamara Stewart ("Plaintiff") hereby files her Unopposed Motion for Extension of Time	
17		
10	for Trans Union to Answer ("Motion") and is	n support states:
18		
19	1. Trans Union's responsive plead	ding to the Complaint is due on January 6, 2024.
20	2. Plaintiff and Trans Union are actively engaged in case-resolution negotiations.	
21		
21	3. Plaintiff does not oppose an e	xtension of Trans Union's time to respond to the
22		
	Complaint so that the parties may devote the	eir energies to resolving this matter. Trans Union
23	$3 \parallel$	
	respectfully requests the Court for an extens	sion of time to file its responsive pleading for 14
24		
25	days, which is up to and including <b>January 20, 2025</b> .	
25	4 77 37 3	
26	4. The Motion is not for delay.	
27	5. This is Trans Union's first exte	ension of time and the requested extension does not

28

prejudice the parties.

- 1	
1	6. For the foregoing reasons, Plaintiff requests that the Court issue an order
2	extending the date by which Trans Union must answer or otherwise respond to Plaintiff's
3	Complaint to January 20, 2025.
4	DATED January 4, 2025.
5	
6	Respectfully submitted,
7	
8	/s/ Gerardo Avalos
9	George Haines, Esq. Gerardo Avalos, Esq.
10	8985 S. Eastern Ave., Suite 100 Las Vegas, Nevada 89123
11	Counsel for Plaintiff
12	
13	GOOD CAUSE SHOWN, IT IS SO ORDERED.
14 15	Dated 1/6/2025
16	
17	UNITED STATES MAGISTRATE JUDGE
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
၁၇	